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1	Jason Kuller, NV Bar No. 12244
	Jason Kuller, NV Bar No. 12244 Robert Montes, Jr., CA Bar No.159137 (<i>Pro Hac Vice</i>
2	RAFII & ASSOCIATES, P.C.
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3	Las Vegas, Nevada 89144 Phone: 725.245.6056
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4	Fax: 725.220.1802
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5	robert@rafiilaw.com Attorneys for Plaintiffs
	Attorneys for Plaintiffs
6	

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTINA CANTU and REBEKAH	
SVINNING, on behalf of themselves and	all
others similarly situated,	

Plaintiffs,

v.

THOMPSON MICHIE ASSOCIATES, LLC, a foreign limited liability company; TM EQUITIES INC., f/k/a THOMPSON MICHIE ASSOCIATES, INC., a foreign corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 2:24-CV-00908-APG-DJA

STIPULATION AND ORDER EXTENDING DEADLINE FOR PLAINTIFF TO FILE MOTION FOR PRELIMINARY APPROVAL

(SECOND REQUEST)

Plaintiffs CHRISTINA CANTU and REBEKAH SVINNING, by and through their counsel of record, and Defendants THOMPSON MICHIE ASSOCIATES, LLC and TM EQUITIES INC., f/k/a THOMPSON MICHIE ASSOCIATES, INC. ("Defendants") by and through their counsel of record, hereby stipulate and agree, pursuant to LR IA 6-1 and 6-2, as follows. This is the second request for the extension of this deadline.

1. Plaintiffs' counsel, Robert Montes and Jason Kuller, were actively engaged in preparing Plaintiffs' Motion for Preliminary Approval ("Motion"), but require a brief extension due to recent scheduling conflicts, including limited availability of lead counsel and recent illness affecting co-counsel.

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To date, there are still scheduling conflicts, and co-counsel has missed several days

On July 30, 2025, parties filed stipulation to extend the deadline to submit a Motion

By this stipulation, the parties agree to a further one-week extension for Plaintiffs

of work due to a recurring and disabling health disorder that remains undiagnosed. Plaintiffs'

counsel has consulted with two medical specialists and is scheduled for two diagnostic procedures

this week requiring anesthesia. Due to these circumstances, additional time is needed to fully and

adequately finalize the Motion.

for one week to August 6, 2025. ECF No. 39.

to file their Motion from August 6, 2025, to August 13, 2025.

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RAFII & ASSOCIATES, P.C. EXCELLENCE | COMMITMENT | RESULTS

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1	5. This request is made in good faith and not for the purpose of delay.			
2	6. The Parties agree that they are not waiving, relinquishing, or otherwise impairing			
3	any claim, defense, or other right they may have by virtue of entering into this Joint Stipulation.			
4				
5	D . 1.1. 5th 1			
6	Dated this 5 th day of August, 2025.			
7	LEWIS BRISBOIS BISGAARD & SMITH	RAFII & ASSOCIATES, P.C.		
8	LLP	/s/ Robert Montes		
9	/s/ Maria Thompson (with permission) Maria Thompson, Esq.	Robert Montes, Jr., Esq. (<i>Pro Hac Vice</i>) CA Bar No.159137		
10	Nevada Bar No. 16762	1120 N. Town Center, Suite 130		
11	6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118	Las Vegas, Nevada 89144 Attorneys for Plaintiff		
12	Attorneys for Defendant Thompson Michie Associates, LLC			
13		HOLLAND & HART LLP		
14		/s/ Sydney Gambee (with permission) Sydney R. Gambee, Esq.		
15		Nevada Bar No. 14204		
16		9555 Hillwood Drive, 2 nd Floor Las Vegas, Nevada 89134		
17		Attorneys for Defendant TM Equities, Inc.		
18				
19	ORDER			
20	IT IS SO ORDERED.			

IT IS SO ORDERED.

I FURTHER ORDER that the stipulation for extension of time at ECF No. 39 is DENIED as moot.

UNITED STATES DISTRICT JUDGE

Dated: August 6, 2025